

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL GROUND AND PARCEL SELECT GROUND
SERVICE STANDARD CHANGES, 2022

Docket No. N2022-1

**MOTION OF THE UNITED STATES POSTAL SERVICE TO ADVANCE
THE DATE FOR ISSUING THE ADVISORY OPINION**

(April 25, 2022)

The United States Postal Service, respectfully moves the Commission as follows:

1. On March 21, 2022, in accordance with 39 U.S.C. § 3661(b), the Postal Service filed its Request for an Advisory Opinion on Changes in the Nature of Postal Services (Request) seeking to upgrade the service standard for Retail Ground and Parcel Select Ground in the contiguous United States from the current two- to eight-day standard to a two- to five-day standard.
2. On March 15, 2022, in accordance with Rule 111, the Postal Service conducted a pre-filing conference with respect to the planned service standard changes.
3. On March 23, 2022, the Postal Regulatory Commission (Commission) issued Order No. 6124 that, among other things, established the procedural schedule for these proceedings.
4. Order No. 6124 provided, in part, that a Technical Conference would be held in this proceeding on March 31, 2022. In addition, Order 6124 required all parties interested in attending the Technical Conference to pre-register by March 28, 2022.

5. On March 29, 2022, the Commission issued Order No. 6129 cancelling the Technical Conference scheduled for March 31, 2022, because no parties other than the Postal Service and Commission staff (including the Public Representative) had registered for the conference and no one had requested to speak or provided questions.

6. In accordance with the procedural schedule established by Order No. 6124, all parties seeking to intervene in this docket were required to file notice thereof by April 4, 2022. As of the filing of this motion, no party has sought to intervene.

7. On April 14, 2022, the Postal Service and the Public Representative stipulated and agreed, among other things, that (i) no further discovery requests or testimony would be filed in this proceeding unless requested by the Commission; and (ii) that neither a hearing nor oral argument or examination are necessary in determining whether the planned service standard changes for RG and PSG, as described in this Docket, are in accordance with the policies of Title 39 of the United States Code and in furtherance of the public interest.

8. On April 19, 2022, the Postal Service, with the consent of the Public Representative, moved: (1) to accelerate the procedural schedule established by Order No. 6124; and (2) for admission into the record of the direct testimony and related library references offered in support of the subject Request.

9. Good cause exists to support an accelerated Advisory Opinion in that there are likely to be few, if any, contested material issues, given that there are no interventions or expressions of opposition in this docket. Expedition would also serve business planning needs, as it is easier to plan for implementation with greater certainty. Furthermore, with the benefit of an advisory opinion issued earlier, the Postal Service

would have more time to be able to consider the Advisory Opinion. Expedition would further demonstrate the Commission's ability to flexibly process nationwide service change dockets proportionally to the issues presented, and the level of interest shown by the public.

10. The Postal Service therefore respectfully suggests that preparation of the advisory opinion can reasonably occur on a more accelerated basis. The Postal Service respectfully suggests that a deadline of May 31, 2022—being 18 days after replies briefs are filed—would be reasonable under these circumstances.

WHEREFORE, the Postal Service respectfully requests that the Commission modify the Procedural Schedule to accelerate issuance of the advisory opinion.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony Alverno
Chief Counsel, Global Business & Service
Development

Christopher O'Connell
Andrew Pigott
C. Dennis Southard IV
Attorneys

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1135
(202) 268-6284
Dennis.Southard@usps.gov
April 25, 2022